

BY ECF

June 21, 2021

Hon. Cathy Seibel
The Hon. Charles L. Brieant Jr. Federal
Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re:

The Wave Studio, LLC v. Booking Holdings Inc., et al., Case No. 1:21-cv-02691-CS-PED

Dear Judge Seibel,

We write pursuant to Paragraph 1(A) of Your Honor's Individual Practices regarding the Proposed Stipulation and Order filed by the parties in the above-captioned action (the "Booking Holdings Action") on May 4, 2021 (ECF No. 35). As noted in the Proposed Stipulation and Order and the accompanying letter from counsel for plaintiff The Wave Studio, LLC ("Plaintiff") dated May 4, 2021 (ECF No. 36), the parties stipulated and agreed to:

1. Consolidate the Booking Holdings Action with *The Wave Studio, LLC v. General Hotel Mgmt. Ltd.*, et al., Case No. 7:13-cv-09239-CS-PED (the "GHM Action");
2. Stay the Booking Holdings Action, pending the resolution of a litigation in Singapore between Plaintiff and General Hotel Mgmt. Ltd. ("GHM"); and
3. Extend the deadline for each defendant in the Booking Holdings Action to respond to Plaintiff's complaint to either: (a) a date within sixty (60) days of the stay being lifted in the GHM Action, if the Booking Holdings Action is stayed pending the resolution of the action between Plaintiff and GHM in Singapore; or (b) June 25, 2021, if the Booking Holdings Action is not consolidated with the GHM Action and not stayed.

The Court accepted the Booking Holdings Action as related to the GHM Action on May 10, 2021. Because the Bookings Holdings Action is not yet stayed or consolidated with the GHM Action, the current deadline for each defendant to respond to Plaintiff's Complaint in this case is June 25, 2021.

The parties respectfully request that Your Honor issue an order consolidating and staying the Booking Holdings Action in order to promote judicial economy and to extend the deadline for each defendant in the Booking Holdings Action to respond to Plaintiff's complaint until a date within sixty (60) days of the stay being lifted.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kristen A. McCallion

Kristen A. McCallion

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**To be admitted Pro Hac Vice*

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